

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL DIVISION
51 BERKELEY WAY, ANNEX 7
BERKELEY, CA 94704



April 22, 1988

Commanding Officer
Naval Station Treasure Island
Building I (Code 70)
San Francisco, CA 94130-5000
(Attn: Mr. Kam Tung)

Dear Mr. Tung:

**ACTION MEMORANDUM, ENGINEERING EVALUATION/COST ASSESSMENT, AND
WORKPLAN FOR REMOVAL OF ASBESTOS CONTAINING MATERIAL**

We have reviewed the above documents for the proposed removal action to mitigate external, above-ground asbestos-containing material identified at various locations at Hunters Point Annex.

While the proposed action is intended to remove above ground asbestos-containing wastes, excavation of soil to a depth of up to two feet was also proposed to remove asbestos-contaminated soil in non-RI/FS areas. As stated in the proposal, asbestos-containing wastes may be disposed at any landfill that has waste discharge requirements issued by the Regional Water Quality Control Board. However, the Department is concerned that some of the excavated soil may contain other contaminants (such as PCBs, heavy metals, etc.) and may have to be disposed of at a class I landfill. Therefore, we request that the removal action be limited to the removal of asbestos-containing wastes above soil and to capping of these areas for any subsequent remedial investigation activities.

Additional comments are also provided below:

1. Page 2-1. Reference made to "disposal of friable asbestos material" should be "Under Section 25143.7 of the California Health and Safety Code..." instead of "California Hazardous Waste Act".
2. Table 3-1. The table indicates Site E is in a RI/FS area, but shows removal and backfill as the clean-up method. This is inconsistent with the text which states that asbestos-contaminated soil in RI/FS areas will be capped.

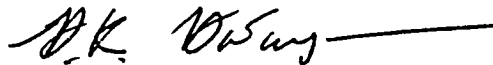
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3. Page 3-4. Piles removed from the scrap yard should be transported to an appropriate disposal site instead of being stored on-site.
4. The Department disagrees with the use of arbitrarily determined level of 1% as background level and with the subsequent use of background level as clean-up criteria. However, since we request that the removal action be limited to above soil, this issue becomes moot.

If you have any questions, please contact Chein Kao of this office at (415) 540-3052.

Sincerely,



Howard K. Hatayama, Chief
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division

cc: Alex Dong, Navy West Div
Roger James, SF RWQCB
Jerry Clifford, U.S. EPA, Region IX
Scott Lutz, BAAQMD
Dave Wells, SF DPH
Steve Castleman, SF DA

HKH:ck:na